

EXHIBIT 2

From: Steve Ring[SMTP:SHR@RINGLAW.US]
Sent: Sunday, May 08, 2011 7:58:56 PM
To: Saunders, Sanford (Shld-DC-LT)
Subject: bsi v world ave; H supp AI No. 1, servers
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Sandy:

Attached please find the Supplemental and Amended Response of Hypertouch to Interrogatory 1 of the February 4 set, concerning server locations.

Stephen H. Ring
Law Offices of Stephen H. Ring, P. C.
506 Main Street, Suite 215
Gaithersburg, Maryland 20878
Ph 301-563-9249
Fx 301-563-9639
shr@ringlaw.us

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6/1/2011

**IN THE U.S. DISTRICT COURT FOR MARYLAND
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.

Plaintiff,

v.

WORLD AVENUE U.S.A., LLC et al

Defendants.

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Case No. 8:08-cv-00921-PJM

**THIRD PARTY DEFENDANT HYPERTOUCH, INC'S SUPPLEMENTAL
RESPONSES AND OBJECTIONS TO DEFENDANT'S WORLD AVENUE USA,
LLC'S (WUSA) INTERROGATORY No. 1
RELATING TO THE AUGUST TRIAL**

Third Party Defendant Hypertouch, Inc. (Hypertouch), by and through undersigned counsel and pursuant to Rule 33 of the Federal Rules and Rule 104(6) of the Local Rules of the United States District Court for the District of Maryland, hereby submits its supplemental responses and objections to Defendant World Avenue USA, LLC's (WUSA) Interrogatory No. 1.

Hypertouch incorporates by reference all objections stated in its original Responses and Objections.

INTERROGATORY 1:

State with Specificity the Location(s) and the date(s) of commencement where Hypertouch/Joseph Wagner is currently storing, housing, co-locating or is otherwise operating any Computer Equipment. For each Location(s), Identify each piece of Computer Equipment and how each piece of Computer Equipment is currently used.

ANSWER 1:

Hypertouch objects to this Interrogatory on the ground that it is vague, ambiguous, overbroad and unduly burdensome. Hypertouch further objects to the definition of "Hypertouch" as overly broad, unduly burdensome, and purporting to impose obligations on Hypertouch not supported in law. Hypertouch objects to the extent this inquiry is not "directly relevant to the Trial Issues" as set by the Court at DE 544 and as agreed by the Parties; objects to the extent that this Interrogatory duplicates prior interrogatories; objects to the extent that this Interrogatory exceeds the limit on the number of interrogatories that may be issued. Like all technological start-ups in Silicon Valley "computers" are part of nearly every facet of business and the request is overbroad. Relevant to the issue in the case are computers that are the servers that provide Internet services.

Without waiving the above objections, Hypertouch responds as follows for the locations of its servers that are used to provide Internet services for its users:

Hypertouch's DNS servers are identified by the following designations:

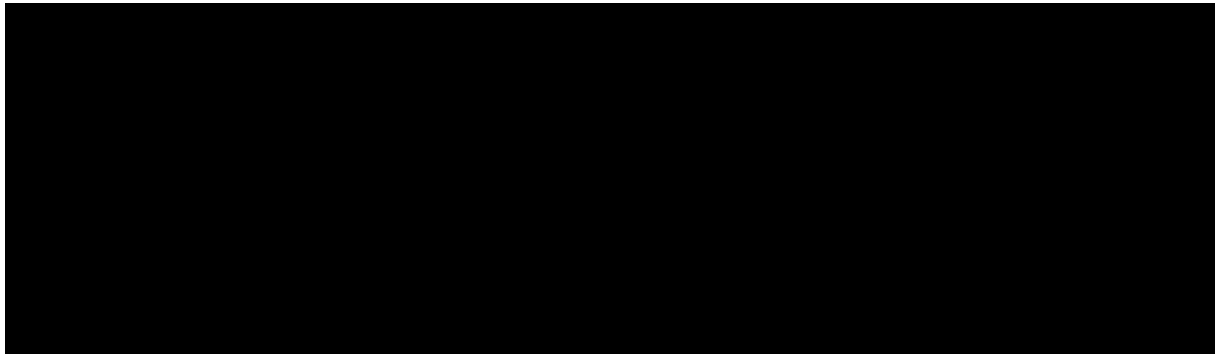
dns1.hypertouch.com (173.164.218.248), dns2.hypertouch.com (71.126.148.133),
dns3.hypertouch.com (173.164.218.245), dns4.hypertouch.com (173.13.253.139),
dns5.hypertouch.com (173.164.218.249).

Hypertouch's mail servers are identified by the following designations: mail.hasit.com (173.164.218.248), altmail.hasit.com (173.164.218.245), mail.reasonabledoubt.com (173.164.218.247), upland.dyndns.org (173.164.218.249), upland2.dyndns.org. (173.164.218.246).

Hypertouch's web servers are identified by the following designations:

dns2.hypertouch.com, www.hypertouch.com (173.13.253.140), wiki.hypertouch.org/
fostercity.dyndns.org (171.64.48.139).

The following servers have been located at the following addresses:



dns1.hypertouch.com: 9 Eagle Hill Terrace, Redwood City, CA 94062 (since April 2, 2004 to approximately May 2006); 751 Upland Road, Redwood City, CA 94062 (approximately May 2006 to June 2010); Current CA Location Address (June 2010 to present)

dns2.hypertouch.com: 1612 Sherwood Rd, Silver Spring MD 20902 (approximately May 2006 to present); 1837 R St NW, Washington DC 20009 (April 2, 2004 to approximately May 2006) www.hypertouch.com: 1837 R St NW, Washington DC 20009 (since April 2004-present)

dns3.hypertouch.com: 9 Eagle Hill Terrace, Redwood City, CA 94062 (since April 2004 to approximately May 2006); 751 Upland Road, Redwood City, CA 94062 (since approximately May 2006 to June 2010); Current CA Location Address (June 2010 to present)

dns4.hypertouch.com: 1837 R St NW, Washington DC 20009 (approximately May 2006-present); 101 Phillips Lane, Woodside, CA (April 2, 2004 to approximately May 2006)

dns5.hypertouch.com: Current CA Location Address (June 2010 to present)

mail.hasit.com: 9 Eagle Hill Terrace, Redwood City, CA 94062 (since April 2004 to approximately May 2006); 751 Upland Road, Redwood City, CA 94062 (since approximately May 2006 to June 2010); Current CA Location Address (June 2010 to present)

altmail.hasit.com: 9 Eagle Hill Terrace, Redwood City, CA 94062 (since April 2004 to approximately May 2006); 751 Upland Road, Redwood City, CA 94062 (since approximately May 2006 to June 2010); Current CA Location Address (June 2010 to present)

mail.reasonabledoubt.com: 9 Eagle Hill Terrace, Redwood City, CA 94062 (since April 2004 to approximately May 2006); 751 Upland Road, Redwood City, CA 94062 (since approximately May 2006 to present) upland.dyndns.org: 751 Upland Road, Redwood City, CA 94062 (January 2007 to June 2010); Current CA Location Address (June 2010 to present)

upland2.dyndns.org: 751 Upland Road, Redwood City, CA 94062 (January 2008 to June 2010); Current CA Location Address (June 2010 to present)

dns5.hypertouch.com: 417A Oak Grove Ave, Menlo Park CA 94025 (telephone number no longer operational) (since June, 2005); 359 Fort Royal Avenue, Foster City, California 94404 (former residence of Joe Wagner, telephone number no

longer operational) (April 2, 2004-June, 2005), Current CA Location Address (June 2010 to present)

fostercity.dyndns.org: 417A Oak Grove Ave, Menlo Park CA 94025 (since June, 2005); 359 Port Royal Avenue, Foster City, California 94404 (former residence of Joe Wagner, telephone number no longer operational) (April 2, 2004-June, 2005) wiki.hypertouch.org: Center for Design Research, Building 560, 424 Panama Mall, Stanford, CA 94305-2232 (September 2009 □present)

[Bold typeface added in printing of supplement.]

Hypertouch provides Internet connectivity for the occupants of 751 Upland Road, Redwood City, CA 94062 and the Current CA Location Address. Discovery is continuing. Hypertouch expressly reserves the right to supplement this Response should additional information become available

SUPPLEMENTAL AND AMENDED RESPONSE:

The text marked in bold type above is hereby supplemented and amended as follows:

mail.reasonabledoubt.com: 9 Eagle Hill Terrace, Redwood City, CA 94062 (since April 2004 to approximately May 2006); 751 Upland Road, Redwood City, CA 94062 (since approximately May 2006 to June 2010); Current CA Location Address (June 2010 to present)

upland.dyndns.org: 751 Upland Road, Redwood City, CA 94062 (January 2007 to June 2010); Current CA Location Address (June 2010 to present)

upland2.dyndns.org: 751 Upland Road, Redwood City, CA 94062 (January 2008 to June 2010); Current CA Location Address (June 2010 to present)

dns5.hypertouch.com: 417A Oak Grove Ave, Menlo Park CA 94025 (telephone number no longer operational) (since June, 2005); 359 Fort Royal Avenue, Foster City, California 94404 (former residence of Joe Wagner, telephone number no longer operational) (April 2, 2004-June, 2005), Current CA Location Address (June 2010 to present)

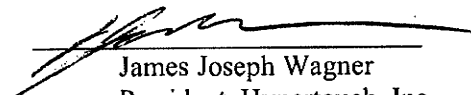
fostercity.dyndns.org: 417A Oak Grove Ave, Menlo Park CA 94025 (since June, 2005); 359 Port Royal Avenue, Foster City, California 94404 (former residence of Joe Wagner, telephone number no longer operational) (April 2, 2004-June, 2005)

wiki.hypertouch.org: Center for Design Research, Building 560, 424 Panama Mall, Stanford, CA 94305-2232 (September 2009 – present)

VERIFICATION

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 9, 2011


James Joseph Wagner
President, Hypertouch, Inc.

As to form and objections only:

_____/s/_____
Stephen H. Ring (USDC-MD Bar No. 00405)
Law Offices of Stephen H. Ring, P. C.
506 Main Street, Suite 215
Gaithersburg, Maryland 20878
Phone: (301) 563-9249
Fax: (301) 563-9639
shr@ringlaw.us

_____/s/_____
Michael S. Rothman (USDC-MD Bar No. 14568)
Law Office of Michael S. Rothman
401 E. Jefferson Street, Suite 201
Rockville, MD 20850
Phone: (301) 251-9660
Fax: (301) 251-9610
mike@mikerothman.com

Attorneys for Third-Party Defendant Hypertouch, Inc.